

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of
Telecommunications and Energy on its own Motion
into the Appropriate Pricing, based upon Total
Element Long-Run Incremental Costs, for
Unbundled Network Elements and Combinations of
Unbundled Network Elements, and the Appropriate
Avoided Cost Discount for Verizon New England,
Inc. d/b/a Verizon Massachusetts' Resale Services
in the Commonwealth of Massachusetts

D.T.E. 01-20

**AT&T'S TWENTIETH SET OF INFORMATION
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon the following
information requests. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name
of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon
subsequently receives or becomes aware of additional information responsive to these
requests.

If an answer refers to Verizon's response to another information request in this proceeding,
please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon
cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege
claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations

The page number references in the following questions are to the hard copy of the Panel

Testimony of Messrs Albert, Anglin, Livecchi and Ms. Matt that was distributed by Verizon on May 8, 2001.

INFORMATION REQUESTS

ATT – VZ 20-1 Refer to Verizon’s response to ATT-VZ 8-1. For each item listed in the first column of the Attachment, please provide the appropriate cite to both the existing tariff and to Verizon’s cost study, as requested in ATT-VZ 8-1.

ATT – VZ 20-2 Refer to Verizon’s response to ATT-VZ 8-1. For each item listed in the first column of the Attachment, please provide a fuller description of such item, including the activities the charges for such item are suppose to cover.

ATT – VZ 20-3 Refer to Verizon’s response to ATT-VZ 8-1, wherein it states

“The information provided in the attached table applies with the following assumptions: . . . Tariff rates from 1/20/01 tariff.”

Is Verizon proposing in this proceeding to charge the rates presently set forth in the existing Tariff No. 17, or is it proposing to charge different rates? If Verizon is proposing to charge different rates, please state what rates Verizon is proposing to charge and, for each such rate,

- a. identify the specific parts of the Verizon cost study that develop and support such rate; and
- b. identify the tariff section that describes the application of such rate and the section that states the existing rate level.

ATT – VZ 20-4 Refer to Verizon’s response to ATT-VZ 8-1, scenarios (a) (1) through (a) (3). Please explain why the charges are identical in each of these three scenarios when each scenario involves the purchase of different components (*e.g.*, scenario (1) involves the purchase of horizontal cable but not riser cable, whereas scenario (2) involves the purchase of riser cable but not horizontal cable).

ATT – VZ 20-5 Refer to Verizon’s response to ATT-VZ 8-1, scenarios (b) (1) through (b) (3). Please explain why the charges are identical in each of these three scenarios when each scenario involves the purchase of different components (*e.g.*, scenario (1) involves the purchase of horizontal cable but not riser cable, whereas scenario (2) involves the purchase of riser cable but not horizontal cable).

ATT – VZ 20-6 Refer to Verizon’s response to ATT-VZ 8-1, scenarios (c) (1) through (c) (3). Please explain why the charges are identical in each of these three scenarios when each scenario involves the purchase of different components (*e.g.*, scenario (1)

involves the purchase of horizontal cable but not riser cable, whereas scenario (2) involves the purchase of riser cable but not horizontal cable).

ATT – VZ 20-7 Refer to Verizon's response to ATT-VZ 8-1, scenarios (d) (1) through (d) (3). Please explain why the charges are identical in each of these three scenarios when each scenario involves the purchase of different components (*e.g.*, scenario (1) involves the purchase of horizontal cable but not riser cable, whereas scenario (2) involves the purchase of riser cable but not horizontal cable).

Respectfully submitted,
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